

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<b>DRAKE CORREA,</b>	§
<b>Plaintiff,</b>	§
	§
	§
<b>v.</b>	§ CIVIL ACTION NO.:
	§ 4:16-CV-02534
<b>CORE 15 RIFLE SYSTEMS,</b>	§
<b>Defendant.</b>	§

**JOINT MOTION TO EXTEND DEADLINES**

TO THE HONORABLE COURT:

The parties file this motion to extend deadlines, as follows:

This is an active case. Plaintiff Expert Reports are due by 8/10/2017. Defendant Expert Reports due by 9/14/2017. Discovery closes on 11/27/2017. Dispositive Motions must be filed by 11/27/2017. Joint Pretrial Order due by 2/19/2018. Non-Dispositive Motion Filing due by 11/27/2017. Trial set for 2/26/2018 at 09:00 AM in Courtroom 3A.

The parties have been working diligently to scheduling testing of the firearm at issue. That testing is now to occur in Oklahoma on October 20, 2017. The parties request that Plaintiff be required to make his expert witness disclosures on Monday, November 20, 2017, and that Defendant be required to make its expert disclosures on December 20, 2017.

The parties request that discovery not close until January 31, 2018 and that dispositive motions be due on that same date.

The trial date of February 26, 2018 is no affected by these changes.

This motion is unopposed, not solely for purposes of delay, but for good cause shown.

Respectfully Submitted,

**HIGHTOWER LAW GROUP, PLLC**

By: /s/ Jeffrey W. Hightower, Jr.  
**JEFFREY W. HIGHTOWER, JR.**  
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CERTIFICATE OF CONFERENCE

This is a joint motion.

s/ Jeffrey W. Hightower, Jr  
Jeffrey W. Hightower, Jr.

/s/ Daniel P. Buechler  
Daniel P. Buechler

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served on all counsel of record on September 18, 2017, in accordance with the Federal Rules of Civil Procedure (through the PACER system).

s/ Jeffrey W. Hightower, Jr.  
Jeffrey W. Hightower, Jr.